

FILED

1981 SEP 8 PM 4 11  
IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION CLERK U.S. DISTRICT COURT

BALLY MANUFACTURING CORPORATION, )  
Plaintiff, ) CIVIL ACTION  
v. ) NO. 78 C 2246  
D. GOTTLIEB & CO., )  
WILLIAMS ELECTRONICS, INC. and )  
ROCKWELL INTERNATIONAL CORPORATION, )  
Defendants. )

NOTICE OF DEPOSITION

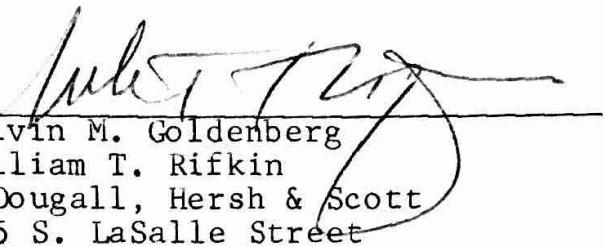
*DOCKETED*  
*SEP - 9 1981*

TO: Donald L. Welsh  
A. Sidney Katz  
Fitch, Even, Tabin, Flannery & Welsh  
135 S. LaSalle Street  
Chicago, Illinois 60603

PLEASE TAKE NOTICE that at 9:00 a.m. on Tuesday, the 15th day of September, 1981, at the offices of Wait, Shamberger, Georgeson, McQuaid & Thompson, Suite 500, 100 West Grove Street, Reno, Nevada 89509 or such other place agreed to by counsel for the parties, the defendants in the above captioned action will take the deposition of Mr. Jesse Huffman upon oral examination pursuant to the Federal Rules of Civil Procedure before a Notary Public or other officer authorized by law to administer oaths. The oral

examination will continue from day to day or until completed or until adjourned by defendants. The witness will be asked to produce the items set forth in the Attachment hereto.

You are invited to attend and cross-examine.

  
Melvin M. Goldenberg  
William T. Rifkin  
McDougall, Hersh & Scott  
135 S. LaSalle Street  
Chicago, Illinois 60603  
(312) 346-0338  
Attorneys for  
Williams Electronics, Inc.

  
John F. Lynch  
Wayne M. Harding  
Arnold, White & Durkee  
2100 Transco Tower  
Houston, Texas 77056  
Attorneys for  
D. Gottlieb & Co. and  
Rockwell International Corporation

ATTACHMENT FOR JESSE HUFFMAN

You are requested to produce for inspection and copying in connection with your deposition all documents and things in your possession, custody or control relating to the subject matter of the Affidavit which you executed February 25, 1981, including without limitation:

1. Documents and things relating to your employment by Intel Corporation during the period 1972 through 1975 which refer or relate to the projects you worked on or the people you worked with insofar as the applications of microprocessors are concerned including, without limitation, Dr. Phil Tai and Hal Feeney.

2. Documents relating to discussions or contacts with Atari Incorporated including, without limitation, contacts with Al Alcorn and Steve Mayer or personnel of Cyan Engineering.

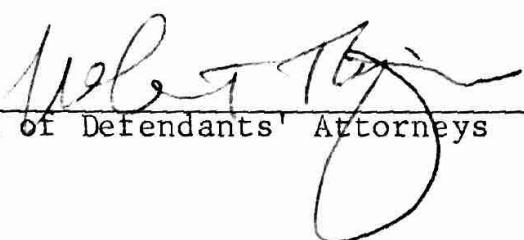
3. Documents relating to the intellect development system reportedly loaned to Cyan Engineering in 1973 or 1974.

4. Documents relating to discussions relating to the use of microprocessor chips in pinball machines by companies other than Atari or which relate to the solicitation by Intel of Atari's business for microprocessor chip sets for pinball machines.

5. Documents relating to the events referred to in paragraphs 7, 8 and 10 of your Affidavit dated February 25, 1981.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing NOTICE OF DEPOSITION was served on plaintiff by hand delivering said copy to their attorneys, Donald L. Welsh, A. Sidney Katz, Fitch, Even, Tabin, Flannery & Welsh, 135 S. LaSalle Street, Chicago, Illinois 60603 this 8th day of September, 1981.

  
\_\_\_\_\_  
One of Defendants' Attorneys

6. Correspondence to or from Bally or its attorneys relating to any of the foregoing matters and specifically including, without limitation, correspondence, notes, tapes, etc., relating to the preparation of the Affidavit.